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BY ELECTRONIC FILING

Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Robert S. Kelly, Criminal Docket No. 19-286 (S-1)(AMD)

Dear Judge Donnelly:

This firm as well as the Blank Law Firm represent Robert S. Kelly. We respectfully submit this motion in accordance with Local Criminal Rule 1.1 which incorporates by reference Local Civil Rule 1.4 regarding the withdrawal or displacement of attorneys of record. That rule, in turn, provides that such a motion may be “granted only upon a showing by affidavit or otherwise of satisfactory reasons for withdrawal or displacement and the posture of the case, including its position, if any, on the calendar.” Mr. Kelly has terminated retained counsel Steven Greenberg and Michael Leonard. On June 9, 2021, Mr. Kelly appeared before the Court and stated on the record that he wants to proceed with the undersigned and has terminated Mr. Greenberg and Mr. Leonard. Additionally, Mr. Kelly’s decision would not affect the trial date and deadlines currently scheduled. The Sixth Amendment of the United States Constitution guarantees Mr. Kelly’s right to counsel of his choice. The Supreme Court has held that, “the right to select counsel of one’s choice...has never been derived from the Sixth Amendment’s purpose of ensuring a fair trial. It has been regarded as the root meaning of the constitutional guarantee.” United States v. Gonzalez-Lopez, 548 U.S. 140 (2006).

For the foregoing reasons, Mr. Kelly respectfully submits that the Court relieve Mr. Greenberg and Mr. Leonard as attorneys of record in this case.

Respectfully submitted,

By: _____/s/
Thomas A. Farinella
Nicole Becker Blank
Counsel for Robert S. Kelly